

EX PARTE OR LATE FILED

DOCKET FILE COPY ORIGINAL

LEVINE, BLASZAK, BLOCK & BOOTHBY

1300 CONNECTICUT AVENUE, NW
SUITE 500
WASHINGTON, D.C. 20036-1703
(202) 223-4980
FAX (202) 223-0833

DOCKET FILE COPY ORIGINAL

August 21, 1995

RECEIVED

AUG 21 1995

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Ex Parte Presentation

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

Re: Notice of Oral Ex Parte Presentation on The Use of N11 Codes:
CC Docket No. 92-105; IAD File No. 93-02; IAD File No. 94-101

Dear Mr. Caton:

This letter summarizes a meeting this afternoon between The Washington Post Company and Kathleen Levitz and Marian Gordon of the FCC's Common Carrier Bureau concerning the use and assignment of N11 codes. Mr. Ralph Terkowitz, Ms. Lori Whitted, Mr. John Hockenberry, Mr. Henry Levine and Ms. Deb Boehling attended the meeting on behalf of The Washington Post Company. The attachment to this letter labeled "Meeting Between the Common Carrier Bureau and The Washington Post Company re: Use and Assignment of N11 Codes, August 21, 1995" outlines The Washington Post Company's presentation. It was distributed to Ms. Levitz and Ms. Gordon at the meeting.

In accordance with Section 1.1206(a)(2) the Commission's Rules, I have sent a copy of this letter to Ms. Levitz and Ms. Gordon, and am filing an original and five copies (two copies for filing in each of the referenced proceedings) with the Secretary's office in CC Docket No. 92-105, IAD File No. 93-02, and IAD File No. 94-101.

No. of Copies rec'd
List ABOVE

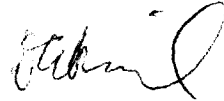
005

LEVINE, BLASZAK, BLOCK & BOOTHBY

Mr. William F. Caton
August 21, 1995
Page 2

If you have any questions concerning this notice of oral ex parte presentation, please contact me at the number above.

Sincerely,

A handwritten signature in black ink, appearing to read "D.E. Boehling", with a stylized flourish at the end.

D.E. Boehling
Counsel to
The Washington Post Company

cc: Kathleen Levitz
Marian R. Gordon

Attachment

**MEETING BETWEEN THE COMMON CARRIER BUREAU AND
THE WASHINGTON POST COMPANY RE:
USE AND ASSIGNMENT OF N11 CODES**

AUGUST 21, 1995

- The use of N11 codes for easy access to high-quality, low-cost, telephone company-billed local information services is in the public interest. N11 codes are technologically designed to provide access to locally based services, can be recognized by LEC billing systems as billable calls, and are familiar to consumers as an easy access vehicle to low cost information services.
- The Washington Post Company would use an N11 code to provide low-cost, pay-per-call information services that complement its existing array of free information services, to recover some of the costs of providing such services, and to enhance the quality of services available over the telephone.
- 800 service -- not an N11 code -- is the appropriate vehicle for providing nationwide, uniform access to Telecommunications Relay Services ("TRS"), because 800 service already incorporates features and provides geographic coverage needed for nationwide TRS, whereas N11 service does not.
- Using N11 codes to access government information services would waste valuable features of N11 codes, such as telephone-company provided billing. If the government services are to be provided nationwide, it would also be costly and time consuming.
- The FCC should direct the LECs to provide N11 codes (and associated N11 transport and billing services) to information services providers for access to high-quality, low-cost local information services. State public utility commissions have repeatedly denied ISP requests for such services, in large part because of the threat that FCC action in the pending dockets would nullify their decisions. And with the notable exception of BellSouth, the LECs have not offered to provide (in fact, The Washington Post Company has experienced strong LEC resistance to providing) N11 services.
- Absent FCC action on the N11 issue, the LECs will continue to resist ISP requests not only for N11 service but for any service that would allow ISPs to provide low-cost pay-per-call services.
- Although N11 is designed to be a local service, such services can and do cross state lines. The FCC should either amend its pay-per-call rules, which require the use of 900 service for interstate pay-per-call services, to permit the use of N11 codes, or waive those rules in appropriate circumstances, such as those presented by The Washington Post Company.

FCC PROCEEDINGS ON THE USE OF N11 CODES

- *The Use of N11 Codes & Other Abbreviated Dialing Arrangements*, CC Docket No. 92-105
- *Use of N11 Codes for Access to Telecommunications Relay Services*, IAD File No. 93-02
- *Requests of Federal Agencies & Others for the Assignment of N11 Codes*, IAD File No. 94-101.

The Washington Post Company representatives

Mr. Ralph Terkowitz -- V.P. - Technology
Ms. Lori Whitted -- Director - Finance and Business Planning
Mr. John Hockenberry -- Assistant General Counsel

Levine, Blaszak, Block & Boothby

Mr. Hank Levine -- outside counsel
Ms. Deb Boehling -- outside counsel